

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION

JUANITA RODRIGUEZ	§	
	§	
V.	§	Civil Action No. 15-55
	§	
ACE EUROPEAN GROUP LIMITED,	§	
TAPCO UNDERWRITERS, INC.,	§	
VERICLAIM, INC., JIMMY LINDSEY,	§	
AND JENNIFER S. HALACHEFF	§	

JOINT STIPULATION OF DISMISSAL

1. Plaintiff and Defendants file this Joint Stipulation of Dismissal under Federal Rule of Civil Procedure 41(a)(1)(A)(ii).
2. Plaintiff is Juanita Rodriguez. Defendants are Ace European Group Limited, Tapco Underwriters, Inc., Vericclaim, Inc., Jimmy Lindsey, and Jennifer S. Halacheff.
3. On July 7, 2015, Plaintiff filed suit against Defendants in the 391st Judicial District Court, Tom Green County, Texas. On August 21, 2015, Defendants removed this cause to the United States District Court for the Northern District of Texas — San Angelo Division.
4. Plaintiff moves to dismiss the suit.
5. Defendants, who have served an answer, agree to the dismissal.
6. This case is not a class action under Federal Rule of Civil Procedure 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2.
7. A receiver has not been appointed in this case.
8. This case is not governed by any federal statute that requires a court order for dismissal of the case.

9. Plaintiff has not previously dismissed any federal or state court suit based on or including the same claims as those presented in this case.

10. This dismissal is with prejudice.

Respectfully submitted,

BY: /s/ Marjorie C. Nicol
Marjorie C. Nicol
State Bar No.: 00784684
SD No.: 18400
mcn@preisplc.com
24 Greenway Plaza, Suite 2050
Houston, Texas 77046
Telephone: (713) 355-6062
Facsimile: (713) 572-9129

ATTORNEY IN CHARGE FOR DEFENDANTS

OF COUNSEL:

PREIS, PLC
William W. Fitzgerald
SBOT: 24038898
SD No.: 570992
wwf@preisplc.com
24 Greenway Plaza, Suite 2050
Houston, Texas 77046
Telephone: (713) 355-6062
Facsimile: (713) 572-9129

By: /s/ Gregory F. Cox
Gregory F. Cox
State Bar No.: 00793561
gcox@mostynlaw.com
The Mostyn Law Firm
6280 Delaware Street
Beaumont, Texas 77706
Telephone: (409) 832-2777
Facsimile: (409) 832-2703

**ATTORNEY IN CHARGE FOR PLAINTIFF
JUANITA RODRIGUEZ**

CERTIFICATE OF SERVICE

In compliance with Rule 5 of the Federal Rules of Civil Procedure, I certify that on this the 17th day of November 2015, a true and correct copy of the above and foregoing document was served on all known counsel of record via electronic service:

Mr. Gregory F. Cox
THE MOSTYN LAW FIRM
6280 Delaware Street
Beaumont, Texas 77706

/s/ Marjorie C. Nicol
Marjorie C. Nicol